

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In Re: New York City Policing During Summer 2020 Demonstrations	20-Cv-8924 (CM) (GWG)
<hr/> This filing is related to: ALL CASES	

**NOTICE OF MOTION**

TO ALL PARTIES IN INTEREST (BY ECF):

PLEASE TAKE NOTICE THAT, upon the affidavit of Joseph Alejandro, sworn to on March 3, 2021, and all prior pleadings and proceedings herein, the POLICE BENEVOLENT ASSOCIATION OF THE CITY OF NEW YORK, INC. (“PBA”) will move this Court, before the Hon. Colleen McMahon, at the United States Courthouse, 500 Pearl Street, New York, NY 10007, on a date to be set by the Court, with any opposing papers to be served and e-filed on or before March 19, 2021 and any reply papers to be served and e-filed on or before March 26, 2021, for an order pursuant to Rule 24 granting leave to the PBA to intervene as a party-defendant in these cases, as limited by the PBA’s brief in support of this motion, together with such other and further relief to the PBA as the Court deems just and equitable.

Dated: March 3, 2021  
New York, New York

**LAW OFFICES OF ROBERT S. SMITH**

By: /s/ Robert S. Smith  
Robert S. Smith

7 Times Square, 28<sup>th</sup> floor  
New York, N.Y. 10036  
Tel.: (917) 225-4190  
Email: [robert.smith@rssmithlaw.com](mailto:robert.smith@rssmithlaw.com)

- and -

**SCHLAM STONE & DOLAN LLP**

By: /s/ Richard H. Dolan  
Richard H. Dolan  
Thomas A. Kissane

26 Broadway, 19<sup>th</sup> Floor  
New York NY 10004  
Tel.: (212) 344-5400  
Fax: (212) 344-7677  
Email: [rdolan@schlamstone.com](mailto:rdolan@schlamstone.com)  
Email: [tkissane@schlamstone.com](mailto:tkissane@schlamstone.com)

*Attorneys for Proposed Intervenor  
Police Benevolent Association of the City of  
New York, Inc.*

MICHAEL T. MURRAY  
Office of the General Counsel  
Police Benevolent Association of the  
City of New York, Inc.  
125 Broad Street, 11th Floor  
New York, NY 10004

Gaurav I. Shah,  
Associate General Counsel

Tel: (212) 298-9144

E-mail: [mmurray@nycpba.org](mailto:mmurray@nycpba.org)  
[gshah@nycpba.org](mailto:gshah@nycpba.org)

*Of Counsel*